



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

N62578.AR.000450
NCBC DAVISVILLE
5090.3a

May 15, 1995

Mr. Robert Krivinskas
U.S. Department of the Navy
Northern Division - NAVFAC/
10 Industrial Highway
Code 1823 - Mail Stop 82
Lester, PA 19113-2090

Re: Navy Response to EPA Comments on the Draft Detailed Analysis
of Alternatives for Sites 10 & 13 at the former Naval
Construction Battalion Center (NCBC), RI

Dear Mr. Krivinskas:

Pursuant to § 7.6 of the NCBC Federal Facility Agreement (FFA),
the Environmental Protection Agency's (EPA) has reviewed the
above referenced document. The responses are, for the most part,
adequate. The following are my comments on the subject document:

1. The Draft Terrestrial ERA has not been submitted, the EE/CA should reflect that EPA had concerns with the draft final ERA so that the Navy initiated additional investigations to address our concerns. The responses to general comment #1 on Site 10 and to general comment # 5 for Site 13 should be revised to reflect this. The Draft PRAP is due to be submitted for review in January 1996, the ERA should be finalized by that time and the actual risk should be incorporated into the remedial decision making process.
2. The EE/CA should be more specific than the draft DAA was in presenting the time frames required to implement alternatives and meet remedial response objectives, (response to general cmt #5-draft DAA for Site 10).
3. Response to specific cmt #1. Please identify the COCs for the other Sites as part of the general facility background section of the EE/CA.
4. Response to specific cmt #1, Vol II. Please provide the schedule for identifying the presence of salamanders/salamander habitat at Site 10.
5. Response to specific cmt #11. Tables 3-7 & 3-8 should be developed IAW chapter 6 of the cited RI/FS guidance since the document is not an ISA, which is covered in chapter 4 of the cited guidance.
6. Response to specific cmt #20. Please elaborate on the QA/QC problems that resulted in re-sampling of soil sample S-13-9.



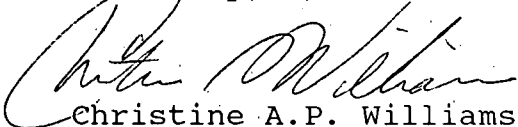
Neither the Phase I nor Phase II RI reports mentioned the problems nor the resultant sampling activities. Locate the resultant sample location on a figure that includes both Phase I and Phase II sample locations. When did the resampling occur? Were Phase I or Phase II work plan sampling and analysis methodologies used?

7. Response to specific cmt #28. There is no additional EPA guidance available on discount rates.

8. Will the time-critical removal action address PCB contamination in the storm drain system? If not, please justify your response as Page 2-19 of the Draft DAA, first paragraph notes that "...PCBs may also be migrating off-site through the catch basins." (See also Draft Phase I RI EPA cmt # 195 and Navy response dated January 1993, Draft Phase II RI EPA cmt # 45 and Navy response dated March 1994).

I look forward to discussing these comments at your earliest convenience, please contact me at (617) 573-5736, to set up a meeting.

Sincerely,



Christine A.P. Williams
Remedial Project Manager
Federal Facilities Superfund Section

cc: Judy Graham, RIDEM
Lou Fayan, NCBC
Tim Prior, US F&WL
Scot Gnewuch, ADL